

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETERSEN ENERGÍA INVERSORA, S.A.U. and
PETERSEN ENERGÍA, S.A.U.,

Plaintiffs,

-against-

ARGENTINE REPUBLIC and YPF S.A.,

Defendants.

Case No.: 1:15-CV-02739 (LAP)

ETON PARK CAPITAL MANAGEMENT, L.P.,
ETON PARK MASTER FUND, LTD., and ETON
PARK FUND, L.P.,

Plaintiffs,

-against-

ARGENTINE REPUBLIC and YPF S.A.,

Defendants.

Case No.: 1:16-CV-08569 (LAP)

**STIPULATION AND [PROPOSED] ORDER
REGARDING PLAINTIFFS' PRIVILEGE CLAIMS**

WHEREAS, on December 22, 2020, the Court directed the parties to “confer and propose a briefing schedule” on (i) the issue of Spanish privilege law “[t]o the extent that Plaintiffs still assert that such a privilege applies in this litigation” and (ii) “privilege based on a litigation funding arrangement with non-parties,” (*Petersen* ECF No. 249);

NOW THEREFORE, in consideration of the foregoing, IT IS HEREBY
STIPULATED AND AGREED by and between the parties, through their undersigned counsel,
AND SO ORDERED as follows:

1. Plaintiffs stipulate that they have not withheld any documents based on privileges under Spanish law;
2. Plaintiffs stipulate that they will not rely on any privileges under Spanish law for the remainder of these proceedings;¹ and
3. The parties agree to the following briefing schedule on the applicability of privilege based on a litigation funding arrangement:
 - Plaintiffs' moving brief: January 11, 2021
 - Defendants' opposition brief: January 25, 2021
 - Plaintiffs' reply brief: February 1, 2021.

Dated: January 11, 2021

SULLIVAN & CROMWELL, LLP

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By: /s/ Mark P. Goodman
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Respectfully submitted,

KELLOGG HANSEN TODD FIGEL &
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Inversora, S.A.U., Petersen Energía,
S.A.U., Eton Park Capital Management,
L.P., Eton Park Master Fund, Ltd., and
Eton Park Fund, L.P.*

¹ The parties will meet and confer if a document or question implicates the Petersen Plaintiffs' receiver's representation of other parties, because the privilege may be applicable in that circumstance.

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Counsel for Defendant YPF S.A.

SO ORDERED this ____ day of _____, 2021.

LORETTA A. PRESKA
Senior United States District Judge